

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 7

TEAM SYSTEMS INTERNATIONAL, LLC,

Case No. 22-10066 (CTG)

Debtor.

George L. Miller, solely in his capacity as the
Chapter 7 Trustee of Team Systems
International, LLC,

Plaintiff,

Adv. Proc. No. 23-50004 (CTG)

-against-

Deborah Evans Mott, Steven M. Acosta,
Christopher Mott, John S. Maciorowski,
Addy Road LLC, Brent Road LLC,
Benjamin P. Smith, Jessica M. Smith, and
TSI Gulf Coast, LLC, and

John Does 1-100,

Defendants.

**AMENDED¹ NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JANUARY 23, 2023 AT 10:00 A.M. (ET)**

**THIS IS AN IN-PERSON HEARING. ALL PARTICIPANTS ARE REQUIRED TO
APPEAR IN PERSON UNLESS PERMITTED TO APPEAR BY ZOOM.**

Remote participation is permitted for: (i) counsel for a party or a pro se litigant that files a responsive pleading and intends to make only a limited argument; (ii) a party or a representative of a party that has not submitted a pleading but is interested in observing the hearing; (iii) any party that is proceeding, in a claims allowance dispute, on a pro se basis; or (iv) extenuating circumstances that warrant remote participation as may be determined by the Court. Zoom participants must register by no later than 4:00 p.m. (ET) on January 20, 2023.

Zoom registration link:

https://debuscourts.zoomgov.com/meeting/register/vJItdu-rqzksEtv9LCJtzHZY_hZWqcxpMgc

¹ Amended items appear in **bold**.

MATTERS GOING FORWARD:

1. Motion of the Chapter 7 Trustee for Entry of an Order (i) Extending the Freeze and Granting Preliminary Injunctive Relief, and (ii) Granting Related Relief, Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 7016 (filed on January 10, 2023) [Main Case D.I. [272](#); Adv. D.I. [3](#)]

Response Deadline: January 20, 2023 at 4:00 p.m. (ET)

Response Received:

- a. **Objection of Deborah Mott, Steven Acosta, Christopher Mott and John S. Maciorowski to Motion of the Chapter 7 Trustee for Entry of an Order (I) Extending the Freeze and Granting Preliminary Injunctive Relief, and (II) Granting Related Relief, Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 7065 (filed on January 20, 2023) [Main Case D.I. [282](#); Adv. D.I. [14](#)]**
- b. **Joinder of Addy Road LLC to Objection of Deborah Mott, Steven Acosta, Christopher Mott and John S. Maciorowski to Motion of the Chapter 7 Trustee for Entry of an Order (I) Extending the Freeze and Granting Preliminary Injunctive Relief, and (II) Granting Related Relief, Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 7065 (filed on January 20, 2023) [Main Case D.I. [284](#); Adv. D.I. [15](#)]**
- c. **Joinder of Benjamin P. Smith and Jessica M. Smith to the Objection of Deborah Mott, Steven Acosta, Christopher Mott and John S. Maciorowski to Motion of the Chapter 7 Trustee for Entry of an Order (I) Extending the Freeze and Granting Preliminary Injunctive Relief, and (II) Granting Related Relief, Pursuant to 11 U.S.C. § 105(A) and Fed. R. Bankr. P. 7065 and Further Objections to Motion (filed on January 20, 2023) [Main Case D.I. [283](#); Adv. D.I. [16](#)]**

Related Documents:

- d. Complaint (filed on January 10, 2023) [Main Case D.I. [271](#); Adv. D.I. [1](#)]
- e. Declaration of William A. Homony in Support of the Motion of the Chapter 7 Trustee for Entry of an Order (i) Extending the Freeze and Granting Preliminary Injunctive Relief, and (ii) Granting Related Relief, Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 7016 (filed on January 10, 2023) [Main Case D.I. [273](#); Adv. D.I. [4](#)]
- f. Order Setting Hearing on Motion for Preliminary Injunction (entered on January 11, 2023) [Main Case D.I. [277](#); Adv. D.I. [8](#)]

- g. Notice of Motion, Entry of Order Shortening Notice, and Hearing Scheduled for January 23, 2023 at 10 a.m. (ET) (filed on January 11, 2023) [Main Case D.I. [278](#); Adv. D.I. [9](#)]
- h. Certificate of Service (filed on January 13, 2023) [Main Case D.I. [279](#); Adv. D.I. [10](#)]
- i. **Chapter 7 Trustee's Exhibit and Witness List for January 23, 2023 Hearing (filed on January 10, 2023) [Main Case D.I. [281](#); Adv. D.I. [13](#)]**

Status: This matter is going forward.

Dated: January 21, 2023

ARCHER & GREINER, P.C.

/s/ Bryan J. Hall

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